



Application **GRANTED**. Defendant's deadline to answer or otherwise respond to the Complaint is extended to **March 31, 2025**. The initial pretrial conference scheduled for March 25, 2025, is **ADJOURNED to April 8, 2025 at 3:00 P.M.** By **April 1, 2025**, the parties shall file an updated joint letter and proposed civil case management plan in accordance with the Court's Individual Rules.

March 12, 2025

The Honorable Judge Lorna G. Schofield
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Dated: March 13, 2025
New York, New York

A handwritten signature in black ink, appearing to read "L. G. Schofield".

LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

Re: *Hasani v. Humble Bundle, Inc.*, No. 1:24-cv-09449-LGS (S.D.N.Y.)

Dear Judge Schofield:

Pursuant to Your Honor's Individual Rule I.B(3), Plaintiff Safiullah Hasani ("Plaintiff") and Defendant Humble Bundle, Inc. ("Defendant," and collectively with Plaintiff, the "Parties") hereby submit this joint request for a third extension of time for Defendant to respond to Plaintiff's Complaint and for a short adjournment of the initial pretrial conference scheduled for March 25, 2025.

Defendant's original deadline to answer or otherwise respond to the Complaint was January 17, 2025. The Court has since granted two extensions of Defendant's time to respond. On January 16, 2025, the Court entered an Order extending Defendant's deadline from January 17, 2025 to February 17, 2025 (ECF No. 10). On February 14, 2025, the Court entered an Order further extending Defendant's deadline to answer or respond to the Complaint from February 17, 2025 to March 17, 2025 (ECF No. 17), after the Parties requested additional time to (i) continue their discussions regarding Defendant's potential motion to compel arbitration; and (ii) discuss a potential resolution of the action. The Court's February 14, 2025 Order noted that "[n]o further extension or adjournment will be granted absent an imminent settlement or extraordinary circumstances." *Id.*

On March 11, 2025, Defendant retained Perkins Coie LLP ("Perkins") to represent it in all further proceedings in this action. On March 12, 2025, Defendant filed a Consent Order Granting Substitution of Attorney (ECF No. 19). In light of Perkins' recent retention, Defendant's undersigned counsel requires additional time to review and analyze the pleadings in this action and adequately prepare Defendant's response to the Complaint. Accordingly, the Parties respectfully request a short extension for Defendant to answer or respond to the Complaint from **March 17, 2025**, to **March 31, 2025**, and to adjourn the initial pretrial conference to a subsequent date convenient for the Court. Defendant anticipates filing a motion to compel arbitration contemporaneous with its Answer.

The Parties have conferred and consent to this request and the contents of this letter. We thank the Court for its consideration of this request.

March 12, 2025

Page 2

Respectfully Submitted,

PERKINS COIE LLP

/s/ Rachel S. Mechanic

Rachel S. Mechanic

Attorney for Defendant Humble Bundle Inc.

GUCOVSKI ROZENSHTEYN, PLLC

/s/ Adrian Gucovski

Adrian Gucovski, Esq.

Counsel for Plaintiff and the Class

cc: All attorneys of record via ECF